

JEAN E. WILLIAMS
Acting Assistant Attorney General

SEAN C. DUFFY (NY Bar. No. 4103131)
Trial Attorney
United States Department of Justice
Natural Resources Section
150 M Street NE
Washington, DC 20002
Telephone: (202) 305-0445
Facsimile: (202) 305-0506
sean.c.duffy@usdoj.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION**

BLUE MOUNTAINS BIODIVERSITY
PROJECT,

Plaintiff,

v.

SHANE JEFFRIES, in his official capacity as
Ochoco National Forest Supervisor; and
UNITED STATES FOREST SERVICE,

Defendants.

No. 2:20-cv-2158-SU

**DEFENDANTS' UNOPPOSED MOTION TO
MODIFY THE JOINT PROPOSED INITIAL
CASE MANAGEMENT SCHEDULE
(ECF No. 9)**

On March 19, 2021, the Parties filed a Joint Proposed Initial Case Management Schedule. ECF No. 9 ("Proposed Schedule"). Among other things, the Proposed Schedule includes the Parties' proposed schedule for lodging the administrative record and briefing Plaintiff's motion to supplement, complete, and/or correct the administrative record. *Id.* at 3.

Pursuant to the Proposed Schedule, Plaintiff filed a motion to compel completion of the administrative record on March 22, 2021, ECF No. 10, and Defendants lodged the administrative record with the Court on March 26, 2021. ECF No. 13.

Under the Proposed Schedule, Defendants' brief in opposition to Plaintiff's motion to compel completion of the record is due April 5, 2021 and Plaintiff's reply in support of their motion is due April 12, 2021.

Due to undersigned counsel's pre-existing professional commitments, Defendants will require an extension of a four days (*i.e.*, until April 9, 2021) to file their brief in opposition to Plaintiff's motion to compel completion of the record. The Parties have conferred and Plaintiff does not oppose this proposed extension. During the conferral, the Parties also agreed to extend the deadline for Plaintiff to file the reply in support of their motion to compel completion of the record to April 19, 2021. No additional changes to the Parties' Joint Proposed Case Management Schedule are sought by this motion.

For all of the foregoing reasons, Defendants respectfully request that the Court grant this motion to modify the Proposed Schedule so that Defendants' response to the motion to compel completion of the record is due April 9, 2021 and Plaintiff's reply is due April 19, 2021.

Dated: March 31, 2021

JEAN E. WILLIAMS
Acting Assistant Attorney General
United States Department of Justice

/s/ Sean C. Duffy
SEAN C. DUFFY (NY 4103131)
Environment & Natural Resources Division
Natural Resources Section
150 M Street, NE
Washington, DC 20002
Tel: (202) 305-0445
Fax: (202) 305-0506
E-mail: sean.c.duffy@usdoj.gov

Attorneys for Defendants